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NORTH CENTRAL ASSOCIATION OF FOOD AND DRUG OFFICIALS

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November 24, 1999

U.S. Department of Agriculture
Food Safety and Inspection Service
DOCKET NUMBER 98-045N

Department of Health and Human Services
Centers for Disease Control and Prevention
Food and Drug Administration
DOCKET NUMBER 97N-0074

US Environmental Protection Agency
DOCKET NUMBER OPP-0550B; FRL-6087-7

REF.: Presidents Council on Food Safety, Notice of Meeting - Federal Register Vol. 64, No. 116, June 17, 1999

The North Central Association of Food and Drug Officials (NCAFDFO) would like to register support for the development of a comprehensive national food safety strategic plan by the President's Council on Food Safety. We believe the inclusion of state and local agencies in this important, federal, interagency effort is imperative to meeting the goals of the President's Food Safety Initiative.

NCAFDFO strongly supports the proposals developed by the federal, state, and local agencies represented in the National Food Safety System (NFSS) Initiative. This unprecedented model of interagency cooperation has produced specific recommendations to improve the nation's food safety system. At the same time, we recognize that the NFSS initiative is an ongoing process and urge support of the President's Council to maintain a mechanism for state and local involvement.

At our annual meeting in Indianapolis, Indiana on October 21, 1999, NCAFDFO identified:

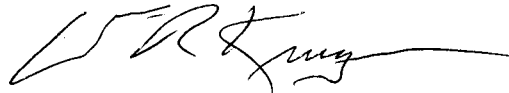
- The President's Food Safety Initiative provides an appropriate foundation for interstate and interagency cooperation and the utilization of the collective resources of government, industry, consumers and academia to reduce, to the greatest extent possible, the incidence of foodborne illness.
- The members of NCAFDFO do hereby believe that it is important and urgent to include local and state involvement in the development of a comprehensive,

national Food Safety Strategic **Plan** by the President's Council on Food Safety.

- . We support the current President's Council interagency strategic planning process and the current goals and objective as articulated in the docket identifying this process.
- We propose that there be established or maintained an ongoing mechanism for state and local involvement that coincides with the President's Council Federal planning process.
- . It is important that this occur during the formative stages of developing the federal plan related to state/local roles and responsibilities.
- . While we believe that the goals and objectives of the President's Council are appropriately general at this time, we wish to encourage specific mention of laboratory capacity and information technology initiatives in future proposed goals.
- The National Food Safety System (NFSS) project plans to submit information from the activities originating from NFSS workgroups in the near future.

In closing, we are pleased that the President's Council on food Safety has begun this important task. We encourage you to build on the momentum generated by the state and local participation begun through NFSS.

Sincerely,

A handwritten signature in black ink, appearing to read 'W. Krueger', with a long horizontal flourish extending to the right.

William Krueger, President
NCAFDO

cc: NCAFDO Board